

1 Honorable Thomas S. Zilly
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7 UNITED STATES DISTRICT COURT
8 WESTERN DISTRICT OF WASHINGTON AT SEATTLE

9 FAIR HOUSING CENTER OF
10 WASHINGTON,

11 Plaintiff,

12 v.

13 BREIER-SCHEETZ PROPERTIES, LLC, a
14 Washington corporation; and FREDERICK
15 BREIER-SCHEETZ, an individual,

16 Defendants.

17 No. 2:16-cv-00922-TSZ

18 DECLARATION OF LAUREN WALKER
19 LEE IN SUPPORT OF MOTION FOR
20 INJUNCTIVE RELIEF

21 I, Lauren Walker Lee, declare as follows:

22 1. I am the executive director of the Fair Housing Center of Washington (FHCW),
23 Plaintiff herein. I am over the age of 18, and am competent to testify.

24 2. FHCW is a non-profit corporation organized under the laws of the state of
25 Washington, which has its principal place of business at 1517 S. Fawcett, Suite 250, Tacoma,
Washington, 98402. The Center was formerly known as the Fair Housing Center of South Puget
Sound.

26 3. The FHCW's mission is to identify and eliminate discriminatory housing
27 practices and to ensure equal housing is available to persons who belong to all federal, state and
local protected classes, including familial status.

28 DECLARATION OF LAUREN WALKER LEE IN SUPPORT OF
29 MOTION FOR INJUNCTIVE RELIEF - 1

30 No. 2:16-cv-00922-MAT
31 10017.04 k#016701

32 MACDONALD HOAGUE & BAYLESS
33 705 Second Avenue, Suite 1500
34 Seattle, Washington 98104
35 Tel 206.622.1604 Fax 206.343.3961

1 4. To achieve this mission, the FHCW provides an array of programs and services
2 designed to eliminate housing discrimination through counseling, education, advocacy, research,
3 and enforcement of fair housing laws. FHCW services and programs include:

4 a) assistance and advocacy on behalf of discrimination victims;
5 b) counseling and referral services regarding discrimination;
6 c) public education regarding discriminatory practices, remedies available, and federal,
7 state, and local fair housing laws;
8 d) leadership on fair housing planning for Washington state entitlement jurisdictions in
9 completing required HUD analyses and assessments;
10 e) regular participation in group meetings, workshops, conferences, and other events
11 designed to promote and ensure compliance with fair housing laws;
12 f) assistance for governmental entities in meeting their fair housing obligations;
13 g) service on various community and governmental boards designed to promote and
14 ensure compliance with fair housing laws;
15 h) investigation and testing of potential housing discrimination; and
16 i) legal action, as necessary, and monitoring and compliance with court orders and
17 consent decrees on fair housing.

18 5. We have extensive experience in these activities. For example, since 1995, the
19 Center's pool of trained testers has conducted approximate 3,000 rental, sales, and mortgage
20 lending tests in Western and Central Washington. For years, in addition to conducting our own
21 tests, we conduct tests at the request of public agencies that investigate housing and lending
22 discrimination. FHCW charges \$700 per test and per training.

23 6. An example of litigation that we brought to vindicate fair housing rights is a
24 disability discrimination class action, *Nevels v. W. World Ins. Co.*, 359 F. Supp.2d 1110 (W.D.
25 Wash. 2004).

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DECLARATION OF LAUREN WALKER LEE IN SUPPORT OF
MOTION FOR INJUNCTIVE RELIEF - 2

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7. Under its former name, the Center was responsible for ensuring that a landlord complied with a five-year Consent Decree entered by this Court in a familial status and race discrimination case, *Hubley v. CIC Corp.*, CV 02-5566 (W.D. Wash. 2005).

I declare under penalty of perjury of the laws of the United States of America and the State of Washington that the foregoing is true and correct.

DATED this 2nd day of June, 2017, at Tacoma, Washington.

Lauren Walker Lee

DECLARATION OF LAUREN WALKER LEE IN SUPPORT OF
MOTION FOR INJUNCTIVE RELIEF - 3

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CERTIFICATE OF SERVICE

I certify that on the date noted below I electronically filed this document entitled

Declaration of Lauren Walker Lee in Support of Motion for Injunctive Relief with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following persons:

Counsel for Defendants

George T. Hunter, WSBA # 14388
5900 48th Ave S
Seattle, WA 98118
Telephone: 206-851-7700
Email: gthunter7700@gmail.com

DATED this 2nd day of June, 2017, at Seattle, Washington.



Esmeralda Valenzuela, Legal Assistant

DECLARATION OF LAUREN WALKER LEE IN SUPPORT OF
MOTION FOR INJUNCTIVE RELIEF - 4

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